

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RUMEYSA OZTURK,

Petitioner,

v.

PATRICIA HYDE, Field Office Director,  
MICHAEL KROL, HSI New England Special  
Agent in Charge, TODD LYONS, Acting  
Director, U.S. Immigration and Customs  
Enforcement, and KRISTI NOEM, Secretary of  
Homeland Security,

Respondents.

Civil Action No. 1:25-cv-10695-DJC

**RESPONDENTS' OPPOSITION TO PETITIONER'S  
MOTION TO PRODUCE PETITIONER TO HER ATTORNEY**

Respondents, by and through their attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, respectfully submits this response to Petitioner Rumeysa Ozturk's ("Petitioner") motion filed on March 26, 2025 seeking Respondents to provide her location and to permit her counsel to communicate with her. Doc. No. 7.

The undersigned can report that Petitioner is currently detained at the South Louisiana Correctional Facility located at 3943 E. Stagg Avenue in Basile, Louisiana.<sup>1</sup> See ICE Online Detainee Locator System, <https://locator.ice.gov/odls/#/search> which provides the following information once Petitioner's name and country of nationality, Turkey, is input.

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<sup>1</sup> Respondents will set forth the timeline of Petitioner's arrest and transfer from Massachusetts in further detail via sworn declaration in its response to Petitioner's Habeas Petition. The undersigned has been informed that Petitioner was detained outside of Massachusetts at the time the Petition was filed and the Court's Service Order was issued.

*Detention Information For:*

***RUMEYSA OZTURK***

***Country of Birth:*** Turkey

*Current Detention Facility:*

***SOUTH LOUISIANA ICE PROCESSING CENTER***

***3843 STAGG AVENUE***

***BASILE, LA 70515***

***Visitor Information:*** (318) 668-5900

The undersigned conveyed that Petitioner would be detained at this location to Petitioner's counsel upon learning such information from Respondents and upon viewing this information on the Online Detainee Locator System at approximately 5:30 PM on March 26, 2025.

In response to Petitioner's request for the Court to order communication be facilitated between Petitioner's counsel and Petitioner, the undersigned can also report that he worked diligently throughout the afternoon and the evening of March 26, 2025 to make Respondents aware of Petitioner's counsel's desire to speak with Petitioner and to keep Petitioner's counsel apprised that such communication would be possible after Petitioner had arrived at the South Louisiana Correctional Facility and had gone through processing at such facility. The undersigned, based on discussions with Respondents and with Petitioner's counsel, can report that Petitioner was able to speak with Petitioner's counsel on March 26, 2025 at approximately 9:45 PM.

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney

Dated: March 27, 2025

By: /s/ Mark Sauter  
Mark Sauter  
Assistant United States Attorney  
United States Attorney's Office  
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**CERTIFICATE OF SERVICE**

I, Mark Sauter, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: March 27, 2025

By: /s/ Mark Sauter  
Mark Sauter  
Assistant United States Attorney